

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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**AFFIRMATION OF J. SCOTT TARBUTTON, ESQ. ATTACHING EXHIBITS IN
SUPPORT OF PLAINTIFFS' AUGUST 26, 2011 LETTER APPLICATION
REQUESTING RULE 37(b) SANCTIONS AGAINST DEFENDANTS MUSLIM WORLD
LEAGUE AND INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

J. Scott Tarbutton, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following exhibits submitted in support of Plaintiffs' August 26, 2011 letter application for sanctions pursuant to Fed. R. Civ. P. 37(b) against defendants, Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO"), for their refusal to obey this Court's April 12, 2011, April 26, 2011, and June 23, 2011 discovery Orders.
2. Exhibit 1 to this Affirmation is a true and accurate copy of Plaintiffs' March 16, 2011 Motion to Compel with attached exhibits.
3. Exhibit 2 to this Affirmation is a true and accurate copy of Plaintiffs' April 7, 2011 Reply (Motion to Compel) with attached exhibits.
4. Exhibit 3 to this Affirmation is a true and accurate copy of Plaintiffs' June 16, 2011 letter to Martin F. McMahon, Esq., counsel for defendants Muslim World League and International Islamic Relief Organization.

5. Exhibit 4 to this Affirmation is a true and accurate copy of Plaintiffs' March 24, 2011 Motion to Compel with attached exhibits.

6. Exhibit 5 to this Affirmation is a true and accurate copy of Plaintiffs' April 21, 2011 Reply (Motion to Compel) with attached exhibits.

7. Exhibit 6 to this Affirmation is a true and accurate copy of the Court's April 26, 2011 Order (MDL Docket No. 2424).

8. Exhibit 7 to this Affirmation is a true and accurate copy of the Court's June 23, 2011 Order (MDL Docket No. 2442).

9. Exhibit 8 to this Affirmation is a true and accurate copy of the July 7, 2011 email from Mr. McMahon to Sean Carter.

10. Exhibit 9 to this Affirmation is a true and accurate copy of the Court's July 26, 2011 Order (MDL Docket No. 2450).

11. Exhibit 10 to this Affirmation is a true and accurate copy of the Declaration of Saleh Abdullah al Saykhan, Manager of the Financial Administration of the IIRO.

12. Exhibit 11 to this Affirmation is a true and accurate copy of the IIRO's Annual Report for 2000-2001.

13. Exhibit 12 to this Affirmation is a true and accurate copy of the MWL's Administrative Chart which can also be found at http://www.themwl.org/Profile/default.aspx?!_AR.

14. Exhibit 13 to this Affirmation is a true and accurate copy of the Declaration of Ali Muhammad al Kamal, Manager for the Financial Affairs Division of the MWL.

15. Exhibit 14 to this Affirmation is a true and accurate copy of the Constitution of the MWL which can also be found in the September-October 1987 edition of the Muslim World League Journal.

16. Exhibit 15 to this Affirmation is a true and accurate copy of the IIRO's Administrative Chart (IIRO000147).

17. Exhibit 16 to this Affirmation is a true and accurate copy of the Executive Summary of the 37th Conference of the MWL Constituent Council, held on April 10-11, 2002.

18. Exhibit 17 to this Affirmation is a true and accurate copy of MWL discovery document MWL005663, with English translation.

19. Exhibit 18 to this Affirmation is a true and accurate copy of the IIRO's Annual Report for October 1996.

20. Exhibit 19 to this Affirmation is a true and accurate copy of IIRO discovery document IIRO000560.

21. Exhibit 20 to this Affirmation is a true and accurate copy of Martin McMahon's November 7, 2007 letter submission to the Honorable George B. Daniels.

22. Exhibit 21 to this Affirmation is a true and accurate copy of relevant sections of the MWL's 25-year anniversary book titled, "The Islamic World League In 25 Years, May 1962-1987: Achievements And A Look To The Future."

23. Exhibit 22 to this Affirmation is a true and accurate copy of a document produced by the IIRO during discovery without bates numbers, with English translation.

24. Exhibit 23 to this Affirmation is a true and accurate copy of a document produced by the IIRO during discovery without bates numbers, with English translation.

25. Exhibit 24 to this Affirmation is a true and accurate copy of the IIRO's Annual Report for 2002-2003 (English).

26. Exhibit 25 to this Affirmation is a true and accurate copy of relevant sections of the December 1999 edition of the Muslim World League Journal.

27. Exhibit 26 to this Affirmation is a true and accurate copy of MWL discovery document MWL005431, with English translation.

28. Exhibit 27 to this Affirmation is a true and accurate copy of IIRO discovery document IIRO001277, with English translation.

29. Exhibit 28 to this Affirmation is a true and accurate copy of MWL discovery document MWL005594, with English translation.

30. Exhibit 29 to this Affirmation is a true and accurate copy of MWL discovery document MWL005345, with English translation.

31. Exhibit 30 to this Affirmation is a true and accurate copy of MWL discovery document JT-MWL-4514, with English translation.

32. Exhibit 31 to this Affirmation is a true and accurate copy of IIRO discovery documents IIRO000969-985.

33. Exhibit 32 to this Affirmation is a true and accurate copy of relevant sections of the Constitution of the International Islamic Relief Organization of Saudi Arabia produced by the IIRO during discovery without bates numbers.

34. Exhibit 33 to this Affirmation is a true and accurate copy of MWL discovery document MWL005322, with English translation.

35. Exhibit 34 to this Affirmation is a true and accurate copy of MWL discovery document MWL005150, with English translation.

36. Exhibit 35 to this Affirmation is a true and accurate copy of MWL discovery document MWL005325, with English translation.

37. Exhibit 36 to this Affirmation is a true and accurate copy of MWL discovery document MWL005323, with English translation.

38. Exhibit 37 to this Affirmation is a true and accurate copy of IIRO discovery documents IIRO001219-1223, with English translation.

39. Exhibit 38 to this Affirmation is a true and accurate copy of MWL discovery document MWL005324, with English translation.

40. Exhibit 39 to this Affirmation is a true and accurate copy of IIRO discovery document IIRO000989.

41. Exhibit 40 to this Affirmation is a true and accurate copy of IIRO discovery document IIRO000997.

42. Exhibit 41 to this Affirmation is a true and accurate copy of a relevant section from the Igatha Journal, dated August 1995, with English translation.

43. Exhibit 42 to this Affirmation is a true and accurate copy of various advertisements taken from the June 1993, August 1995, and May 1995 editions of the Muslim World League Journals.

44. Exhibit 43 to this Affirmation is a true and accurate copy of documentation received from the U.S. Department of the Treasury in response to FOIA Request No. 2003-08-003; FOIA Response on 9/29/2008 RE: Yassin al Kadi, Bates Nos. 0011251-11254.

45. Exhibit 44 to this Affirmation is a true and accurate copy of MWL discovery document MWL005559, with English translation.

46. Exhibit 45 to this Affirmation is a true and accurate copy of MWL discovery document MWL005560, with English translation.

47. Exhibit 46 to this Affirmation is a true and accurate copy of MWL discovery document MWL005561, with English translation.

48. Exhibit 47 to this Affirmation is a true and accurate copy of the January 2001 edition of the Muslim World League Journal.

49. Exhibit 48 to this Affirmation is a true and accurate copy of the February 1998 edition of the Muslim World League Journal.

50. Exhibit 49 to this Affirmation is a true and accurate copy of the February 1996 edition of the Muslim World League Journal.

51. Exhibit 50 to this Affirmation is a true and accurate copy of MWL discovery document MWL005132, with English translation.

52. Exhibit 51 to this Affirmation is a true and accurate copy of MWL discovery document MWL005329, with English translation.

53. Exhibit 52 to this Affirmation is a true and accurate copy of MWL discovery document MWL005207, with English translation.

54. Exhibit 53 to this Affirmation is a true and accurate copy of MWL discovery document MWL005308, with English translation.

55. Exhibit 54 to this Affirmation is a true and accurate copy of MWL discovery documents JT-MWL-04538-4539, with English translation.

56. Exhibit 55 to this Affirmation is a true and accurate copy of MWL discovery documents MWL005916-5919, with English translation.

57. Exhibit 56 to this Affirmation is a true and accurate copy of MWL discovery document MWL005750, with English translation.

58. Exhibit 57 to this Affirmation is a true and accurate copy of MWL discovery document MWL005587, with English translation.

59. Exhibit 58 to this Affirmation is a true and accurate copy of the IIRO's Annual Report for 2007-2008 (Arabic).

60. Affirmed in Philadelphia, Pennsylvania on August 26, 2011.

/S/
J. Scott Tarbutton, Esquire

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